



April 1, 2021

Via E-Mail Only - Joe.Koehler@usdoj.gov

Joseph Koehler
US Attorneys Office
2 Renaissance Square
40 N. Central Ave., Ste. 1800
Phoenix, AZ 85004-4408

DANIEL D. MAYNARD

Re: *United States v. Abdul Kareem*; No. CR15-707-PHX-SRB

Dear Mr. Koehler:

It is our understanding that the Government intends to call several witnesses and possibly use several exhibits at the re-sentencing of Abdul Malik Abdul Kareem ("Mr. Kareem"). Pursuant to the cited Federal Rules of Criminal Procedure and other applicable authorities, please provide me with the following items of discovery:

1. Any written or recorded statements made by Defendant, Mr. Kareem, or copies thereof, within the possession, custody or control of the government that were made after his last sentencing on January 24, 2017. Rule 16(a)(1)(A).
2. The substance of any oral statement which the government intends to offer in evidence at the sentencing made by Mr. Kareem.
3. All handwritten notes or other rough notes made by government agents while interviewing Mr. Kareem since his sentencing. Rule 16(a)(1)(A), *United States v. Harris*, 543 F.2d 1247 (9th Cir. 1976).
4. Copies of any inconsistent statements made by witnesses which the government intends to use at Mr. Kareem's sentencing.

3200 NORTH

CENTRAL AVENUE

SUITE 1800

PHOENIX ARIZONA

85012-2438

TELE 602 279 8500

DIRECT 602 279 8519

FAX 602 263 8185

EMAIL DMaynard@mmcec.com

5. Criminal records, presentence reports or memoranda regarding supervised release of any witnesses the government intends to use at Mr. Kareem's sentencing.
6. The Bureau of Prison disciplinary files on any witnesses the Government intends to use at Mr. Kareem's sentencing.
7. The Bureau of Prison inmate profiles.
8. Communications with counsel for witnesses regarding offers, agreements, or promises pertaining to benefits for furnishing information regarding Mr. Kareem.

Pursuant to *United States v. Harris*, 543 F.2d 1247 (9th Cir. 1976), please have all government agents, whether federal, state or tribal, preserve any and all handwritten notes of witness interviews or investigations for possible use at Mr. Kareem's sentencing as Jencks Act material.

Very truly yours,

A handwritten signature in cursive script that reads "Dan Maynard".

Daniel D. Maynard

DDM/sm

c: Abdul Kareem
Daniel Drake